GESI global environmental solutions, inc

May 18, 2007

Mr. Jamieson Schiff
Textron, Inc.
40 Westminster St
Providence, RI 02903

Subject: **Financial Assurance Information**
SWMU 27 – Former Chrome Plating Lines
Former Textron Automotive Company Facility
Grenada, Mississippi

Dear Mr. Schiff:

Global Environmental Solutions, Inc. (GESI) is pleased to present the attached opinion of cost for monitoring of SWMU 27 (the former Chrome Plating Lines), located at the former Textron Automotive Company (TAC) facility in Grenada, Mississippi (now Grenada Manufacturing, LLC). This work was performed as requested by you in email correspondence with Mr. Brian A. Soucy of GESI. As we understand it, this information will be used as part of a Financial Assurance Demonstration as required by the HSWA permit for the subject facility.

The Financial Assurance Demonstration is based upon the closure of SWMU 27 as originally developed in the "Revised Assessment Report and Closure Plan for the Chrome Plating Line Area" dated January, 2003 by GESI. This closure plan was approved by the United States Environmental Protection Agency (USEPA) on January 30, 2003. Closure activities were performed as specified in the closure plan and GESI developed and submitted the closure report "Revised Closure Report for the Chrome Plating Line Area" dated January, 2004. USEPA's approval of the closure plan included the approval of a closure with waste in place for SWMU 27. The closure report was conditionally approved by USEPA in a letter dated March 2, 2006 (see Attachment A for copies of both letters from USEPA). USEPA granted the conditional approval, including consideration of a No Further Action determination, contingent upon the implementation of acceptable institutional controls. Institutional controls have since been established that ensure that the property is used only for industrial uses.

As part of performing this cost estimate (see Attachment B) we made several assumptions. These assumptions are as follows:

- In accordance with the requirements of the approved SWMU 27 closure plan, the existing concrete slab will not be demolished and no soil will be removed. In addition, there is no post closure monitoring of wells required since the down gradient well, MW 23, will continue to be monitored as part of RCRA post closure monitoring of the Equalization Lagoon (SWMU 2).

2121 newmarket pkwy
suite 140
marietta, ga 30067
tel 770 690 9552
fax 770 690 9529

www.gesinc.com

DOCKET NO. 551444

- An annual inspection of the slab will be performed by a registered Professional Engineer. Any cracks in the slab will be identified and filled with an appropriate material.
- An interest rate of 8% was used when calculating the present value of 30 years of inspection and maintenance.

The results of our cost analysis indicate that the current value of the proposed monitoring and repair is $79,355.

We appreciate the opportunity to work on this important project. If you have any questions please contact us at 770-690-9552.

Sincerely,
GLOBAL ENVIRONMENTAL SOLUTIONS, INC.

James W. Beauchamp, P.E.
Principal Engineer

Brian A. Soucy, P.E.
President

ATTACHMENT A

Closure Plan and Closure Report Approval Letters

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

JAN 3 0 2003

4WD-RPB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams, Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUBJ: Approval of Chrome Plating Line Closure Plan
Grenada Manufacturing, LLC
EPA ID No. MSD 007 037 278

Dear Mr. Williams;

The U.S. Environmental Protection Agency (EPA) has reviewed the Closure Plan for the Chrome Plating Line Area at the Grenada Manufacturing Plant in Grenada, Mississippi dated January 23, 2003. This was the second draft of the document: comments made by EPA on the first draft have been addressed, and EPA is hereby approving the final document.

As a result of a spike of total chromium in the groundwater above the MCL at MW-23 in April 2002, the facility re-developed MW-24 directly up gradient of MW-23 east of the Main Plant building; and sampled MW-23 and MW-24 for total chromium and hexavalent chromium once a month for three months to determine if the April 2002 spike may have been anomalous. Detected levels of total chromium in all three resampling events were lower than the MCL. Hexavalent chromium results were inconclusive due to matrix interferences, probably from high levels of chlorinated organics and toluene present in the samples.

Soil levels of hexavalent chromium range from below the Region 9 industrial PRG for hexavalent chromium of 64 mg/kg, to below the Region 3 industrial RBC for hexavalent chromium of 6,100 mg/kg. This, coupled with low groundwater chromium results from MW-23 directly down gradient of the former chrome plating lines support the conclusion that the soil chromium from the former chrome plating lines can be left in place.

However, there is another overriding concern that may prevent removal of the concrete pad and soil from inside the Main Plant Building at Grenada Manufacturing. MW-24 is contaminated with extremely high levels of Toluene, Trichlorethene, Vinyl Chloride, and cis 1-2 Dichloroethene. Recent analysis of purge water from Monitoring Well 24 resulted in levels of

Toluene; 140,000 ug/l [MCL=1000 ug/l] Trichlorethene; 9,750 ug/l [MCL=5 ug/l] Vinyl Chloride; 3,180ug/l [MCL= 2ug/l] and cis 1-2 Dichloroethene; 19,300 ug/l [MCL=7ug/l]. Relative to the chromium levels seen under the former chrome line area, the chlorinated and volatile organics are a much greater problem.

There is already a concern regarding indoor air quality at the facility. An Indoor Air Vapor Assessment is under way at the facility. The final Indoor Air Monitoring Workplan has been approved and the first round of indoor air monitoring has been scheduled for February 2003. At this time, in EPA's view, it would not be wise to excavate for chromium in soil within the Main Plant building with high levels of chlorinated and volatile organics present. Therefore, EPA will approve a closure with waste in place of SWMU 27, the Former Chrome Plating Line Area. Floors should be sealed as airtight as possible and permanent monitoring of metals, chlorinated and volatile organics must be implemented. EPA will also require an approved Institutional Control of the Main Plant building to ensure that it remains in 'Industrial' land usage rather than 'Residential' land usage.

Remediation of the up gradient source areas for toluene and TCE contamination outside of the Main Plant building, known as AOCs A and B is being required under Grenada's interim measures and corrective measures workplans. Remediation of the down gradient toluene and TCE plume has been approved by EPA. And, because the down gradient remedy is a zero valence metal barrier, it will have the added benefit of chromium reduction.

If you have any questions or concerns regarding this letter, please contact Mr. Don Webster, your EPA Project Manager, at (404) 563-8469.

Sincerely,

N. M. Kumar

Narindar M. Kumar,
Chief, RCRA Programs Branch
Waste Management Division

cc: Louis Crawford, MDEQ
John Bozick, ArvinMeritor
John Devic, Collins and Aikman
Jeffery Karp, Swidler, Berlin, Shereff, Friedman, LLP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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4WD-RPB

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Don Williams
Plant Environmental Coordinator
Grenada Manufacturing, LLC
635 Highway 332
Grenada, Mississippi 38901

SUBJ: January 2006 Closure Report for SWMU 27
Grenada Manufacturing Facility
EPA ID No. MSD 007 037 278

Dear Mr. Williams:

The Environmental Protection Agency (EPA) has received and reviewed the Closure Report for the Chrome Plating Area,[(SWMU 27) dated January 23, 2006, which Grenada Manufacturing LLC submitted in accordance with its Hazardous and Solid Waste Act (HSWA) Permit, modified December 23, 2005.

Previously, the facility had furnished a Certification of Closure with waste in place (Engineering Control) by a registered Professional Engineer, on January 23, 2004.

EPA has determined that the facility has conducted sufficient groundwater monitoring to demonstrate compliance with this portion of the original closure plan submitted January 23, 2004. The facility may discontinue special monitoring at MW 24, up gradient of SWMU 27. The closest well down gradient of SWMU 27, MW 23, will continue to be monitored as part of RCRA post-closure monitoring for the Equalization Lagoon, SWMU 2.

The only component of the closure plan for SWMU 27 remaining to be implemented is the Institutional Controls (ICs) required by condition II.K.3. of the HSWA Permit. When acceptable ICs for the Chrome Plating Area are implemented and documented to EPA, SWMU 27 will be considered for a No Further Action determination. Until the ICs are implemented and documented, the January 23, 2006, Closure Report is conditionally approved.

If you have any questions or concerns regarding this letter and in order to discuss the time frame for IC implementation please contact Mr. Don Webster, your EPA Project Manager, at (404) 562-8469.

Sincerely,

for Paul H. Butler

Jon D. Johnston
Chief, RCRA Programs Branch
Waste Management Division

cc: Toby Cook, MDEQ
John Bozick, ArvinMeritor
Dave McCabe, Textron

ATTACHMENT B

Calculations

GESI

2121 newmarket pkwy
suite 140
marietta, ga 30067
tel 770 690 9552
fax 770 690 9529

Project Name: Textron - Grenada - Financial Assurance
Project Number: 98557.01A
Subject: SWMU 27 Financial Assurance
Page: 1 By: JWB Checked: BAS
Of: 3 Date: 5/16/07 Date: 5/18/07

Problem:

Calculate Financial Assurance costs for SWMU 27. Financial calculations are based upon the information included in the "Revised Closure Report For the Chrome Plating Line Area" Dated January 2004. As shown in Attachment 7 of that report, USEPA has approved closure of SWMU 27 with waste left in place. Therefore no excavation is required. The following costs are based upon inspecting the slab in the area of SWMU 27 on an annual basis, and sealing/repairing any cracks that may appear in the slab. USEPA has determined that that the groundwater reaction barrier installed at the site as part of other remediation activities will mitigate any migration of hexavalent chromium resulting from the area of SWMU 27.

Assumes:

The area to be monitored is 150'x150', Leaving this slab in place will minimize surface water infiltration when the building has been removed. After the building has been removed, the slab will be inspected by a Registered Professional Engineer and any cracks or construction joints will be identified, their locations mapped, and the cracks filled and sealed. An annual inspection will be performed by a registered Professional Engineer and repairs will be made to the identified cracks/construction joints as needed. No post closure monitoring of groundwater will is included in this cost estimate since those affected wells are already being monitored

GESI

2121 newmarket pkwy
suite 140
marietta, ga 30067
tel 770 690 9552
fax 770 690 9529

Project Name: Textron-Grenada- Financial Assurance
Project Number: 98537.01A
Subject: SWMU 27 Financial Assurance
Page: 2 By: JWB Checked: EAS
Of: 3 Date: 5/16/07 Date: 5/18/07

at part of other remediation activities at the site.

Estimated Costs

Year 1 -

Engineer Inspection & Reporting - 24 hrs x $150/hr = $3,600
Expenses = 500
Subtotal = $4,100

Fill all identified surface cracks & construction joints - $15,000

Total for Year 1 = $19,100

Year 2-30

Engineer Inspection & Reporting - 16 hrs x $150/hr = $2,400
Expenses = 500
Subtotal = $2900

Crack Repair = $2,500

Total Each Year (2-30) = $5,400

Now calculate the Present Value of this cost stream:

Assume an interest rate of return on cash of 8%

GESI

2121 newmarket pkwy
suite 140
marietta, ga 30067
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fax 770 690 9529

Project Name: Textron - Grenada - Financial Assurance
Project Number: 98587.01A
Subject: SWMU 27 Financial Assurance
Page: 3 By: JWB Checked: EAS
Of: 3 Date: 5/16/07 Date: 5/18/07

5- The present value of 29 years of $5,400 annual payments using an 8% rate of return is calculated from "Expanded Interest Rate Tables for Economic Analysis Problems" (see attached)

@ 8%

Cost factor @ 8% for 29 years is 11.1584

So $5400 x 11.1584 = $60,255

So total Present value = $60,255 + Year 1 Cost

= $60,255 + $19,100

= $79,355

$i = 8.00\ \%$

n	(P/F)	(P/A)	(P/G)	(F/P)	(F/A)	(A/P)	(A/F)	(A/G)	n
1	0.9259	0.9259	0.0000	1.0800	1.0000	1.0800	1.0000	0.000	1
2	0.8573	1.7833	0.8573	1.1664	2.0800	0.5608	0.4808	0.480	2
3	0.7938	2.5771	2.4450	1.2597	3.2464	0.3880	0.3080	0.948	3
4	0.7350	3.3121	4.6501	1.3605	4.5061	0.3019	0.2219	1.404	4
5	0.6806	3.9927	7.3724	1.4693	5.8666	0.2505	0.1705	1.846	5
6	0.6302	4.6229	10.5233	1.5869	7.3359	0.2163	0.1363	2.276	6
7	0.5835	5.2064	14.0242	1.7138	8.9228	0.1921	0.1121	2.693	7
8	0.5403	5.7466	17.8061	1.8509	10.6366	0.1740	0.0940	3.098	8
9	0.5002	6.2469	21.8081	1.9990	12.4876	0.1601	0.0801	3.491	9
10	0.4632	6.7101	25.9768	2.1589	14.4866	0.1490	0.0690	3.871	10
11	0.4289	7.1390	30.2657	2.3316	16.6455	0.1401	0.0601	4.239	11
12	0.3971	7.5361	34.6339	2.5182	18.9771	0.1327	0.0527	4.595	12
13	0.3677	7.9038	39.0463	2.7196	21.4953	0.1265	0.0465	4.940	13
14	0.3405	8.2442	43.4723	2.9372	24.2149	0.1213	0.0413	5.273	14
15	0.3152	8.5595	47.8857	3.1722	27.1521	0.1168	0.0368	5.594	15
16	0.2919	8.8514	52.2640	3.4259	30.3243	0.1130	0.0330	5.904	16
17	0.2703	9.1216	56.5883	3.7000	33.7502	0.1096	0.0296	6.203	17
18	0.2502	9.3719	60.8426	3.9960	37.4502	0.1067	0.0267	6.492	18
19	0.2317	9.6036	65.0134	4.3157	41.4463	0.1041	0.0241	6.769	19
20	0.2145	9.8181	69.0898	4.6610	45.7620	0.1019	0.0219	7.036	20
21	0.1987	10.0168	73.0629	5.0338	50.4229	0.0998	0.0198	7.294	21
22	0.1839	10.2007	76.9257	5.4365	55.4568	0.0980	0.0180	7.541	22
23	0.1703	10.3711	80.6726	5.8715	60.8933	0.0964	0.0164	7.778	23
24	0.1577	10.5288	84.2997	6.3412	66.7648	0.0950	0.0150	8.006	24
25	0.1460	10.6748	87.8041	6.8485	73.1059	0.0937	0.0137	8.225	25
26	0.1352	10.8100	91.1842	7.3964	79.9544	0.0925	0.0125	8.435	26
27	0.1252	10.9352	94.4390	7.9881	87.3508	0.0914	0.0114	8.636	27
28	0.1159	11.0511	97.5687	8.6271	95.3388	0.0905	0.0105	8.828	28
29	0.1073	11.1584	100.5738	9.3173	103.9659	0.0896	0.0096	9.013	29
30	0.0994	11.2578	103.4558	10.0627	113.2832	0.0888	0.0088	9.189	30
31	0.0920	11.3498	106.2163	10.8677	123.3459	0.0881	0.0081	9.358	31
32	0.0852	11.4350	108.8575	11.7371	134.2135	0.0875	0.0075	9.519	32
33	0.0789	11.5139	111.3819	12.6760	145.9506	0.0869	0.0069	9.673	33
34	0.0730	11.5869	113.7924	13.6901	158.6267	0.0863	0.0063	9.820	34
35	0.0676	11.6546	116.0920	14.7853	172.3168	0.0858	0.0058	9.961	35
36	0.0626	11.7172	118.2839	15.9682	187.1021	0.0853	0.0053	10.094	36
37	0.0580	11.7752	120.3713	17.2456	203.0703	0.0849	0.0049	10.222	37
38	0.0537	11.8289	122.3579	18.6253	220.3159	0.0845	0.0045	10.344	38
39	0.0497	11.8786	124.2470	20.1153	238.9412	0.0842	0.0042	10.459	39
40	0.0460	11.9246	126.0422	21.7245	259.0565	0.0839	0.0039	10.569	40
41	0.0426	11.9672	127.7470	23.4625	280.7810	0.0836	0.0036	10.674	41
42	0.0395	12.0067	129.3651	25.3395	304.2435	0.0833	0.0033	10.774	42
43	0.0365	12.0432	130.8998	27.3666	329.5830	0.0830	0.0030	10.869	43
44	0.0338	12.0771	132.3547	29.5560	356.9496	0.0828	0.0028	10.959	44
45	0.0313	12.1084	133.7331	31.9204	386.5056	0.0826	0.0026	11.044	45
46	0.0290	12.1374	135.0384	34.4741	418.4261	0.0824	0.0024	11.125	46
47	0.0269	12.1643	136.2739	37.2320	452.9002	0.0822	0.0022	11.202	47
48	0.0249	12.1891	137.4428	40.2106	490.1322	0.0820	0.0020	11.275	48
49	0.0230	12.2122	138.5480	43.4274	530.3427	0.0819	0.0019	11.345	49
50	0.0213	12.2335	139.5928	46.9016	573.7702	0.0817	0.0017	11.410	50
51	0.0197	12.2532	140.5799	50.6537	620.6718	0.0816	0.0016	11.472	51
52	0.0183	12.2715	141.5121	54.7060	671.3255	0.0815	0.0015	11.531	52
53	0.0169	12.2884	142.3923	59.0825	726.0316	0.0814	0.0014	11.587	53
54	0.0157	12.3041	143.2229	63.8091	785.1141	0.0813	0.0013	11.640	54
55	0.0145	12.3186	144.0065	68.9139	848.9232	0.0812	0.0012	11.690	55
60	0.0099	12.3766	147.3000	101.2571	1253.2133	0.0808	0.0008	11.901	60
65	0.0067	12.4160	149.7387	148.7798	1847.2481	0.0805	0.0005	12.060	65
70	0.0046	12.4428	151.5326	218.6064	2720.0801	0.0804	0.0004	12.178	70
75	0.0031	12.4611	152.8448	321.2045	4002.5566	0.0802	0.0002	12.265	75
80	0.0021	12.4735	153.8001	471.9548	5886.9354	0.0802	0.0002	12.330	80
85	0.0014	12.4820	154.4925	693.4565	8655.7061	0.0801	0.0001	12.377	85
90	0.0010	12.4877	154.9925	1018.9151	12723.9386	0.0801	0.0001	12.411	90
95	0.0007	12.4917	155.3524	1497.1205	18701.5069	0.0801	0.0001	12.436	95
100	0.0005	12.4943	155.6107	2199.7613	27484.5157	0.0800	0.0000	12.454	100

Source: Expanded Interest Tables For Economic Analysis Problems
Fourth Edition
Michael R. Lindeburg, P.E. (1988)